

ALLEN & OVERY

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Allen & Overy LLP

1221 Avenue of the Americas
New York, NY 10020

Tel +1 857 353 4500
Fax +1 857 353 4599
Direct line +1 212 610 6369
Mobile +1 347 598 2690
Eugene.Ingoglia@AllenOvery.com

March 26, 2024

Re: *United States v. Mario Rodriguez*, No. 20 Cr. 301 (PKC)

Dear Judge Castel:

We represent the defendant, Mario Rodriguez, in the above-captioned matter. We write to respectfully request an adjournment of his sentencing proceeding that is currently scheduled for April 11, 2024 at 2:00 p.m.

We request an adjournment of approximately 60 days to a date convenient for the Court on or after June 17, 2024, to allow further time for us to visit Mr. Rodriguez at the Essex County Correctional Facility (“Essex”) to discuss the first draft of the Presentence Investigation Report (“PSR”), which we received on March 15, 2024; to incorporate his input into the first round of objections to it; and to allow sufficient time for the Probation Office to complete its final report in advance of sentencing. An adjournment also would provide more time to prepare our draft sentencing submission based on the information provided in the PSR.

In addition, an adjournment would allow more time for Mr. Rodriguez’s orthopedic surgery consultation to occur, which we understand Essex has approved and scheduled. For security reasons, neither we nor Mr. Rodriguez know the date of the consultation.

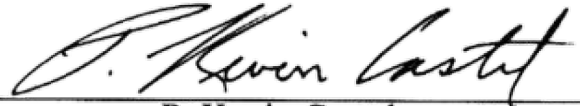
This is our second request for an adjournment of the sentencing proceeding. Our first request for a sentencing adjournment was granted on January 17, 2024. We have conferred with the government about this request and their availability, and they have consented to this request. We are available to answer any questions Your Honor may have.

Respectfully submitted,

/s/ Eugene Ingoglia

Eugene Ingoglia

Sentencing is adjourned from April 11, 2024 to
June 27, 2024 at 11:00 a.m. in Courtroom 11D.
SO ORDERED.
Dated: 3/27/2024


P. Kevin Castel
United States District Judge

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Partner

CC: AUSA Nicholas Chiuchiolo, AUSA Peter Davis